

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FREDERICK E. LANDRIGAN

Index #: 07CIV8669
(WCC)(MDF)

Plaintiff,

-against-

LEO R. KAYTES, JR., LEO KAYTES FORD, INC.,
P.O. RON DONNATIN and THE TOWN OF WARWICK,

Defendants.
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**RESPONSE TO
REQUEST FOR
PRODUCTION OF
DOCUMENTS**

1. This Interrogatory calls for information which is within the knowledge of co-defendants Leo R. Kaytes, Jr. and Leo Kaytes Ford, Inc.

2. Plaintiff's document request #2 calls for information which is within the knowledge of the co-defendants Leo R. Kaytes, Jr. and Leo Kaytes Ford, Inc.

3. Plaintiff's document request #3 calls for documents and records that are within the custody and control of the Town of Warwick and the Town of Warwick Police Department.

4. Plaintiff's document request #4 calls for information, documents, etc. which are contained within the control of defendant Town of Warwick as well as the Town of Warwick Police Department.

5. Plaintiff's document request #5 calls for information, documents, etc. which are contained within the control of defendant Town of Warwick as well as the Town of Warwick Police Department.

6. Plaintiff's document request #6 calls for information, documents, etc. which are contained within the control of defendant Town of Warwick as well as the Town of Warwick Police Department.

7. Plaintiff's document request #7 calls for information, documents, etc. which are contained within the control of defendant Town of Warwick as well as the Town of Warwick Police Department.

8. Plaintiff's document request #8 calls for information, documents, etc. which are contained within the control of defendant Town of Warwick as well as the Town of Warwick Police Department.

9. Plaintiff's document request #9 requests and calls for information that as in part been disclosed. Any further audio recordings of any communications other than what has already been disclosed is within the control and possession of co-defendant Town of Warwick as well as the Town of Warwick Police Department.

10. Plaintiff's document request #10 calls for information, documents, etc. which are contained within the control of defendant Town of Warwick as well as the Town of Warwick Police Department.

11. Plaintiff's document request #11 calls for information, documents, etc. which are contained within the custody and control of the Orange County District Attorney's Office.

12. Plaintiff's document request #12 calls for information, documents, etc. which are contained within the control of defendant Town of Warwick as well as the Town of Warwick Police Department.

13. Plaintiff's document request #13 calls for documents concerning claims that Ron Donnatin violated 42 U.S.C. Sec. 1983 or any persons constitutional rights made at any time since April 19, 2002. All non-privileged documents concerning such claims as referenced above can be reviewed at this law office at a time mutually convenient to the parties.

14. Plaintiff's document request #14 calls for a complete copy of any insurance policy providing for the defense or indemnification of the claims in the Amended Complaint. This defendant is in the process of obtaining such insurance policy for and in response to counsel's inquiry.

DATED: White Plains, New York
May 13, 2008

Yours, etc.,

HODGES, WALSH & SLATER, LLP

By: 

Harold L. Moroknek
Attorneys for Defendants
P.O. Ron Donnatin
55 Church Street, Suite 211
White Plains, N.Y. 10601
(914) 385-6000

TO: Law Offices of Clifford G. Kleinbaum
Attorneys for Plaintiff
11 Martine Avenue, 12th Floor
White Plains, NY 10606

Law Offices of Donald Frum
Attorneys for Defendant
Town of Warwick
565 Taxter Road – Suite 150
Elmsford, NY 10523

Gallagher, Walker, Bianco & Plastaras, Esqs.
Attorney for Defendants
Kaytes
98 Willis Avenue
Mineola, NY 11501